Management System Description: Records Management

Management System Owner: John Sattler
Point of Contact: Jackie Schoultheis

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1.0 Purpose

The Environmental Management Consolidated Business Center (EMCBC) Records Management System establishes a central federal enterprise wide methodology for promoting the lifecycle management of records and information content (regardless of media) throughout each record's lifecycle (creation/receipt, maintenance/use, and disposition). Records Management is critical to the successful mission of the EMCBC and provides evidence of the activities, organization, functions, policies, decisions, procedures, and operations. Sound records management principles protect the legal and financial rights of the government and individuals, preserve historical legacy information, and facilitate the effective retrieval of essential information. The Records Management System also confirms compliance with additional record-keeping requirements in all mission-related functions and provides continuity in the event of a disaster.

2.0 Responsibilities

The table below represents roles and responsibilities specific to this Management System. For a detailed description of CBC MS roles and responsibilities, please see the EMCBC Functions Responsibilities and Authorities Document,

Roles	Responsibilities
EMCBC Director	• Appoint a Records Management Field Officer (RMFO) for the EMCBC and for the Environmental Management (EM) Small Sites to implement Records Management Programs, act as liaison with the DOE Headquarters Program Records Officer (PRO), and provide oversight and guidance to the EMCBC, EM Small Sites, supported sites and their site contractor Records Programs.
Records Management Field Officer (EMCBC)	• Develops, implements, and coordinates records management program activities at the EMCBC, acts as a liaison with the PRO and provides oversight and guidance to the EMCBC.
Records Management Field Officer (Small Sites & EMCBC Support Sites)	• Develops, implements, and coordinates records management program activities for the EM Small Sites and EMCBC supported sites, acts as

Roles	Responsibilities
	a liaison with the PRO and provides oversight and guidance to the small sites and EMCBC support sites (Federal and Contractor).
Assistant Directors / Federal Project Directors / Field Element Manager	• Appoint a Records Custodian/Records Coordinator to coordinate records management activities within their respective organization/site, and ensure compliance with the Records Management Program.
Assistant Director, Office of Contracting	• Ensure that all applicable Federal records requirements, including Contractor Requirement Documents (CRD) embedded in DOE Orders, records management scope and Government/Contractor ownership clauses are incorporated into all applicable contracts.
Assistant Director, Office of Information Resource Management	• Ensure that DOE Records Management Program provisions and standards are included in the scope and planning for all electronic information systems utilized by the EMCBC and support sites.
Assistant Director, Office of Chief Counsel	• Ensures implementation and administers the Privacy Act and Freedom of Information Act Programs of the EMCBC.
Records Custodian (EMCBC) / Records Coordinator (EM Small Sites)	• Coordinate records management activities within their respective organization/site to ensure compliance with the Records Management Program. • Act as the Point-of-Contact for issues, concerns, and questions regarding records management activities for their respective organization and/or site.
EMCBC Employees (including Small Site Federal Employees)	• Identify information created or received, regardless of the media form as a record, non-record, or quality assurance record. • Ensure records are maintained so that they are accessible and easy to retrieve in accordance with EMCBC Records Management Policies and Procedures (or applicable site procedures). These responsibilities apply to all records, regardless of media (email, electronic, paper, etc.).

3.0 Management System Operation

3.1 Overview

Records management at the EMCBC is a life-cycle application of systematic controls to manage the creation/receipt, maintenance/use and disposition of records required to support statutory, regulatory, fiscal, operational, and historical activities within our organizations. The EMCBC records management solution is capable of managing records in various media (i.e., electronic, photographs, etc.) and has stringent processes/procedures for ensuring applicable records management requirements are met (i.e., maintenance, retrieval, disposition, security, etc.).

Creating a records management solution is the responsibility of the records management staff, its focus is lifecycle records management to ensure records are created/received, maintained for the required retention period, protecting records that require special handling and dispositioned in accordance with the DOE Records Disposition Schedules.

3.2 Key Program and Technical Elements

The Records Management program consists of the following Program and Technical Elements:

- **Program Elements**

  o **Recordkeeping Requirements** – Recordkeeping requirements are statements in statutes, regulations, agency directives, and other authoritative issuances providing general and specific information on particular records to be created and maintained by the agency.

  o **Creation / Receipt** – A successful records management program begins with having good information management practices at the creation/receipt of the information, regardless of media, and utilizing those practices throughout the life cycle of the record. The manner in which the records are created and collected impacts upon records maintenance, use, and disposition.   With most records being created and received electronically, records management functions (records lifecycle) are managed within an Electronic Records Management System (ERMS).

  o **Inventory Process** – A successful records management program is founded on the knowledge of what records are created/received and where they are located. Once records are inventoried, decisions can be made on the value of the information and on how the records should be managed. An effective inventory covers all media, includes records/non-records, active/inactive records and is utilized to develop a master file plan.

- o **Scheduling and Disposition Processes** – A key part of any successful records management program is having a schedule indicating how long a record is kept before it is transferred to inactive storage facilities, Federal Records Centers, other Federal agencies, National Archives Records Administration (NARA), or destroyed. For consistency of application, the schedules must be current, clear, specific, and verified periodically.

  No records can be destroyed without the approval of the Archivist of the United States (36 CFR 1228), which is given through the NARA-approved DOE Records Disposition Schedules.

  Further, records may not be removed from Federal custody or destroyed, without regard to the provisions of these schedules. The unauthorized destruction, removal, or mutilation of records is punishable by fines and imprisonment as specified in 18 United States Code, Chapter 101, Part 2071.

- o **Record Requests** – A successful records management program contains access controls to protect information and records against loss, destruction, or alteration; and to ensure security requirements are met. Access controls limit both the people who may obtain the information or record, and ensures that the people who have rights to such information are allowed access.

- o **Records Storage** – DOE must ensure the proper storage of records based on NARA requirements and the media which may require additional storage considerations (e.g., quality assurance records, contaminated records, X-rays, and records moratoriums, etc.).

- o **Disaster Prevention and Recovery Program -** Policies, plans, and procedures to protect and to reconstruct records in the event of an emergency or disaster must be in place.

- o **Vital Records Program** – Polices, responsibilities and requirements to identify (vital records inventory) and protect legal and financial rights records and emergency operating records needed to ensure the continuity of operation and performance of essential functions during an emergency or disaster and resumption of normal business operations thereafter.

- **Technical Elements**

- o **Declassification Initiative** – Declassification is the process that certifies the safe disclosure of information previously withheld for national security reasons [Classified record functions are performed by the EMCBC Classification Office, Lakewood, CO].

- o **Epidemiology Records** – Epidemiology records are documents that contain industrial hygiene; worker identification and laboratory test results; and site organization configuration and operation information.

- o **Contaminated Records** – Contaminated records are those records containing external impurities that render the media on which the records are stored unsafe for human handling without special precautions.

- o **Contract Language and Government / Contractor Ownership** –36 CFR 1222.32 clearly states that, "Agencies must specify in the contract Government ownership and the delivery to the Government of all records necessary for the adequate and proper documentation of contractor-operated agency activities and programs…" Therefore, all contracts issued by DOE, regardless of type, should be evaluated by the appropriate staff to determine the appropriate records management regulations, requirements and scope to include.

- o **Site Transition** – Is a process that is utilized when a site (or work at a site) is transferred from one Program entity to another. For example, from Environmental Management (EM) to Legacy Management (LM). This process typically involves developing various plans and documents to ensure the proper transition, including a site transition plan, information and records management transition plan, etc. and needs to be a joint effort with the appropriate staff.

- o **Administrative Records –** the complete body of records that documents an agency's decision-making process and the basis for the agency's decision; there are different types of AR's based on a site's requirements (CERCLA, NEPA, RCRA, etc.).

- o **Privacy Act, Freedom of Information, Proprietary Issues*** – The Privacy Act and the Freedom of Information Act (FOIA) are laws that prescribe special policies, principles, standards, and techniques for the maintenance, use, and access to certain Federal records. The Privacy Act specifically addresses managing records that are searchable and retrievable by a person's name or a unique identifier. FOIA addresses public access to existing Federal records, except those records that are exempt from FOIA. Proprietary issues address the management of Federal records containing a business entity's proprietary information that, if known to competitors or others would likely cause harm to the business entity. *** At the EMCBC, these functions are performed by the Office of Chief Counsel, with Records Management support**.

4.0 Requirements

4.1 Primary Responsibility

This Management System has primary responsibility for ("owns") the following requirements:

Document	Title
44 U.S.C. Chapters 21	National Archives and Records Administration
44 U.S.C. Chapters 29	Records Management by the Archivist of the United

Document	Title
	States and by the Administrator of General Services Administration
44 U.S.C. Chapters 31	Records Management by Federal Agencies
44 U.S.C. Chapters 33	Disposal of Records
44 U.S.C. Chapters 35	Federal Information Policy
18 U.S.C. 2071	Removal or Destruction of Federal Records
36 CFR Chapter 12, Subchapter B	Records Management
DOE O 243.1A	Records Management Program
DOE O 243.2	Vital Records
DOE O 206.1	Privacy Act
DOE O 200.1A	Information Management

4.2 Parsed Responsibility

This Management System is responsible for a part of the following high-level requirements:

Document	Title
10 CFR 830, Subpart A	Quality Assurance Requirements
DOE O 414.1D	Quality Assurance
EM-QA-001	Environmental Management (EM) Quality Assurance Program (QAP)
ASME NQA-1-2008, and addenda through 2009	Quality Assurance Requirements for Nuclear Facility Applications
DOE O 150.1	Continuity of Operations

5.0 Subject Areas, Program Descriptions, and Guidance Documents

The following Subject Areas are maintained by this Management System:

Records Management addresses the lifecycle of records. The records lifecycle is the period of time that records are in existence and consists of three phases: Creation / Receipt, Maintenance/Use and Disposition.

Creation / Receipt

- o Procedure 1. Identifying, Filing and Maintaining Paper Records

Maintenance / Use

- o Policy PS-205-05. Email Retention, Storage and Archiving
- o Procedure 2. File Plan Maintenance
- o Procedure 3. Vital Records Identification and Protection
- o Procedure 4. Identifying, Filing and Maintaining Electronic Records*
- o Procedure 5. Transferring Inactive Paper Records to Records Holding Area / Records Storage Facility
- o Procedure 6. Records Disaster Prevention Inspections
- o Procedure 8. Processing of Records Requests*
- o Procedure IP-414-04. Quality Assurance Records
- o
- o Plan. Records Disaster Prevention, Mitigation and Recovery Plan

Disposition

- o Technical Instruction 1: Activation of Records Recovery Action Team
- o Technical Instruction 2: Transferring of Temporary Inactive Paper Records to a Federal Records Center or Permanent Records to the National Archives and Records Administration
- o Procedure 7. Destruction of Temporary Unclassified Paper Records

*In development

6.0 References

Document	Title
P.L. 93-579, 5 U.S.C. 552a(m)	Privacy Act of 1974
P.L. 89-487, 5 U.S.C. 552(g)	Freedom of Information Act (FOIA)
DOD 5015.2-STD	Electronic Records Management Software Application Design Criteria Standard
DOE O 471.6	Information Security
DOE M 471.3-1	Manual for Identifying and Protecting Official Use Only Information
DOE O 471.1B	Identification and Protection of Unclassified Controlled Nuclear Information Manual
DOE Acquisition Guide	DOE Acquisition Guide Chapter 4.7 (Records Management)
PL 107-347, 44 U.S.C. Chapter 36	E-Government Act of 2002